

1 Paul T. Trimmer  
2 Nevada State Bar No. 9291  
3 Eric Magnus (*admitted Pro Hac Vice*)  
4 Georgia Bar No. 801405  
5 Daniel I. Aquino  
6 Nevada State Bar No. 12682  
7 **JACKSON LEWIS P.C.**  
8 300 S. Fourth Street, Suite 900  
9 Las Vegas, Nevada 89101  
10 Tel: (702) 921-2460  
11 Fax: (702) 921-2461  
12 Email: [paul.trimmer@jacksonlewis.com](mailto:paul.trimmer@jacksonlewis.com)  
13 Email: [daniel.aquino@jacksonlewis.com](mailto:daniel.aquino@jacksonlewis.com)

14 *Attorneys for Defendant*

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16 **UNITED STATES DISTRICT COURT**

17

18 **DISTRICT OF NEVADA**

19 LISA DANIELS,

20 Plaintiff,

21 vs.

22 ARIA RESORT & CASINO, LLC; DOES I  
23 through V, inclusive; and ROE  
24 CORPORATIONS I through V, inclusive

25 Defendants.

26 Case No.: 2: 20-cv-00453-GMN-DJA

27 **STIPULATION AND PROPOSED  
28 ORDER TO STAY CASE PENDING  
MEDIATION**

29 Defendant Aria Resort & Casino, LLC, (“Defendant” or “Aria”), by and through its  
30 counsel, Jackson Lewis P.C., and Plaintiff Lisa Daniels (“Plaintiff”), by and through her counsel,  
31 Claggett & Sykes Law Firm, hereby stipulate and request an order staying all proceedings,  
32 discovery, and related deadlines in this matter pending mediation, including Plaintiff’s Reply in  
33 Support of her Motion for Conditional Certification of a Collective Action which is currently due  
34 December 23, 2020. The parties have agreed to engage in a mediation of all claims presented in  
35 Plaintiff’s Complaint. The parties believe that the mediation has a high chance of success, and in  
36 an effort to be as efficient as possible, in terms of both time and expenses, would like to refrain  
37 from conducting further expensive and time-consuming discovery and motion practice while the  
38 mediation is pending. The parties have identified potential mediators and fully anticipate  
39 conducting the mediation on or before February 26, 2021.

If the mediation is successful, the case will be resolved in its entirety. However, even if the case does settle, given the nature of Plaintiff's claims and the legal requirements for court approval of settlements in Fair Labor Standards Act ("FLSA") cases, the parties will still require some intervention of the Court.

Accordingly, the parties stipulate and request that this matter be stayed in its entirety until February 26, 2021. On or before February 26, 2021, the parties will submit a joint status report to the Court indicating the result of the mediation and either proposing a discovery plan and scheduling order or a schedule for approval of the settlement.

If the Court does not grant the parties' requested stipulation to stay this matter, the parties alternately stipulate that Plaintiff's Reply in Support of her Motion for Conditional Certification of a Collective Action be due five days after the Court's order denying the stay.

This is the parties' first request for a stay in this matter and is made in good faith and not for the purpose of delay. As a trial date has not yet been set in this case, the trial will not be postponed due to the requested stay.

Based on the foregoing, the parties respectfully request that the Court enter an order granting the parties' requested relief.

Dated this 22nd day of December, 2020.

CLAGGETT & SYKES LAW FIRM

JACKSON LEWIS P.C.

/s/ Joseph N. Mott  
 Sean K. Claggett, Esq., Nevada Bar No. 8407  
 Joseph N. Mott, Esq., Nevada Bar No. 12455  
 4101 Meadows Lane, Suite 100  
 Las Vegas, Nevada 89107

Attorneys for Plaintiff

/s/ Daniel I. Aquino  
 Paul T. Trimmer, Nevada State Bar No. 9291  
 Eric Magnus (admitted Pro Hac Vice)  
 Daniel I. Aquino, Nevada State Bar No. 12682  
 300 S. Fourth Street, Suite 900  
 Las Vegas, Nevada 89101

Attorneys for Defendant

## ORDER

**IT IS HEREBY ORDERED** this matter is stayed in its entirety until February 26, 2021.

**IT IS FURTHER ORDERED** the parties will submit to the Court a joint status report on or before February 26, 2021. The status report will include the results of the parties' mediation efforts and propose a schedule for the case to proceed either with discovery or the settlement approval process.

Dated this 23 day of December, 2020.

Gloria M. Navarro, District Judge  
United States District Court